

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
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)
Advanced Television Systems and) MM Docket No. 87-268
Their Impact upon the Existing)
Television Broadcast Service)

TO: The Commission

OPPOSITION OF GANNETT CO. INC.

Gannett Co., Inc. ("Gannett"), by its attorneys, hereby submits this Opposition to the Petition for Reconsideration of Trinity Christian Center of Santa Ana, Inc. d/b/a Trinity Broadcasting Network ("TBN"), filed in the above-captioned proceeding on June 13, 1997 ("Petition"). In its Petition, TBN seeks, among other things, changes in the Commission's DTV channel assignments for Gannett's stations KVUE-TV, Austin, TX, WBIR-TV, Knoxville, TN, KSDK(TV), St. Louis, MO and KMOH-TV, Kingman, AZ.¹ Gannett opposes the changes.

¹ Gannett is the parent company of the licensees of these stations: KVUE-TV, Inc., Multimedia WBIR, Inc., Multimedia KSDK, Inc. and Multimedia, Inc., respectively.

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The Petition requests 47 channel substitutions to protect those of TBN's more than 200 licensed or authorized TV translators which it has determined are mutually exclusive with DTV channel allotments.

Gannett specifically opposes the substitution of channel 38 for channel 33 at KVUE-TV in Austin, channel 63 for channel 31 at WBIR-TV in Knoxville, channel 50 for channel 35 at KSDK in St. Louis and channel 49 for channel 19 at KMOH-TV in Kingman, as proposed by TBN. Gannett is concerned, moreover, that the large number of requested changes in the DTV table that have been proposed by TBN could create a "daisy-chain" scenario that would affect other DTV channel assignments not only in the Austin, Knoxville and St. Louis markets but in other cities coast-to-coast. In view of the Commission's decision to maintain the secondary status of TV translators and LPTV stations, any such widespread disruption of the table would be unreasonable and inappropriate.

In Gannett's view, the Commission's efforts to change the DTV channel assignments adopted in the Sixth Report and Order in this proceeding because of interference considerations should be limited to those situations affecting full-power television stations. Accordingly, Gannett urges the Commission to deny the relief sought by TBN and limit its interference-based channel assignment changes to those instances where clear issues of

service degradation affecting full service stations are present. Modifications in the table that are motivated by less critical technical matters should be discouraged in view of the very real likelihood that wholesale changes will cause additional significant problems to broadcasters who are now planning to use the assignments the Commission has given them.

Respectfully submitted,

GANNETT CO., INC.

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July 18, 1997

CERTIFICATE OF SERVICE

I, Lila A. Mitkiewicz, a secretary with the law firm of Reed Smith Shaw & McClay LLP, hereby certify that a copy of the foregoing **OPPOSITION OF GANNETT CO., INC.** was served by United States mail, first-class, postage prepaid, on this 18th day of July, 1997, on the following person at the addressee listed below:

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Lila A. Mitkiewicz